

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF OKLAHOMA**

<b>HULL’S ENVIROMENTAL SERVICES, INC.</b>	)	
<b>Plaintiff,</b>	)	
<b>v.</b>	)	<b>Case No. 24-CIV-479-JAR</b>
	)	
<b>MARINA DEL REY, LLC.,</b>	)	
<b>UNITED STATES OF AMERICA, ex rel</b>	)	
<b>SECRETARY OF ARMY / U.S. ARMY</b>	)	
<b>CORPS OF ENGINEERS; et al.</b>	)	
<b>Defendants.</b>	)	

**UNITED STATES OF AMERICA’S UNOPPOSED MOTION TO EXTEND DEADLINE  
TO FILE REPLY IN SUPPORT OF MOTION TO DISMISS**

COMES NOW Defendant United States of America, by and through Christopher J. Wilson, United States Attorney for the Eastern District of Oklahoma, and Alexander Sisemore and Michael O’Malley, Assistant United States Attorneys, move this Court for an order under Local Civil Rule 7.1(i) extending the deadline to file a Reply brief in support of its Motion to Dismiss, [Dkt. #9], by four business days, or until February 4, 2025. In support of this motion, Defendant submits the following:

1. On December 18, 2024, Defendant United States filed its Motion to Dismiss for Lack of Subject Matter Jurisdiction and Failure to State a Claim (“Defendant’s Motion”), [Dkt. #9].
2. After receiving an extension of time to respond, on January 16, 2025, Plaintiff filed its Response to Defendant’s Motion, [Dkt. #18].
3. Under Local Rule LCvR 7.1(e), any Reply brief in support of Defendant’s Motion is due within 14 days of Plaintiff’s response brief being filed, here, January 29, 2025.
4. Defendant United States has made no prior request to extend the reply brief deadline.



5. There is currently no scheduling order in place. This motion is not made to unduly delay, hinder, or otherwise obstruct progress of this case and will not affect any pending deadlines in this case.
6. Counsel for Defendant United States has conferred with Plaintiff's counsel regarding the relief requested and Plaintiff's counsel has no objection.

**WHEREFORE**, premises considered, Defendant United States of America requests this Court enter an order permitting Defendant to file a reply to its Motion to Dismiss by February 4, 2025.

Respectfully submitted,

CHRISTOPHER J. WILSON  
United States Attorney

/s/Michael O'Malley  
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**CERTIFICATE OF MAILING**

I hereby certify that on January 29, 2025, I electronically filed the foregoing, using the CM/ECF system for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Mike Mordy  
Carrie Pfrehm  
Bradley Wilson  
Conner Dunn  
Douglas Elliott

/s/Michael O'Malley  
Assistant United States Attorney